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15 Attorneys for Plaintiffs

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 VICTORIA MUÑOZ, *et al.*,

Case No. C 05-01525 (JSW) (EDL)

19 Plaintiffs,

**JOINT STATUS REPORT
REGARDING SETTLEMENT
NEGOTIATIONS AND MOTION
FOR CLASS CERTIFICATION;
REQUEST FOR FURTHER STATUS
CONFERENCE**

20 v.

21 SACRAMENTO AREA COUNCIL OF
22 GOVERNMENTS, *et al.*,

23 Defendants.

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1 Pursuant to this Court's November 22, 2006 order, the parties provide the following status
2 update concerning settlement negotiations.

3 As of the filing of this report, Plaintiffs have settlement agreements in the process of being
4 executed with defendants Caltrans and CHP. Plaintiffs continue to negotiate the terms of
5 settlement agreements with both defendant Riverside County Transportation Commission
6 (Riverside) and defendant San Bernardino County Service Authority for Freeway Emergencies
7 (San Bernardino). Most, if not all, significant issues that remained in dispute between plaintiffs
8 and these two defendants appear to have been largely resolved late in October. Riverside recently
9 provided Plaintiffs with a new revised draft agreement which was returned with some further
10 revisions to Riverside on December 6, 2006. Counsel for the three parties anticipate a further
11 exchange of drafts with a view toward finalizing the documents within weeks.

12 Once all settlement agreements have been executed, the parties would then jointly
13 complete preparation and file a stipulated motion for class certification for settlement purposes
14 and for preliminary approval of the settlements.

15 The parties further request the Court set a status conference on Friday, January 19, 2007 at
16 1:30 p.m., or a date thereafter convenient to the Court.



23 Dated: December 12, 2006
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1 DATE: December 8, 2006

Respectfully submitted,

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3 CALIFORNIA CENTER FOR LAW
4 AND THE DEAF
J. Kendrick Kresse
Jennifer Pesek

5 DISABILITY RIGHTS LEGAL CENTER
6 Shawna L. Parks

7 MORRISON & FOERSTER, LLP
8 Patricia S. Mar
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Rita F. Lin

9
10 By: _____ /s/ Yoshiko Inoue
11 Attorneys for Plaintiffs

12 DATE: December 8, 2006

13 Joshua Irwin
14 Deputy Attorney General
California Department of Justice
Office of the Attorney General
Oakland, CA 94612-0550

15 By: _____ /s/ Joshua Irwin
16 Attorney for Defendants California Highway
17 Patrol and Commissioner Mike Brown

18 DATE: December 8, 2006

19 Jeffrey Benowitz
20 Department of Transportation, Legal Division
4050 Taylor Street, MS 130
San Diego, CA 92110

21 By: _____ /s/ Jeffrey Benowitz
22 Attorney for Defendants California
23 Department of Transportation and Director
Will Kempton

24 DATE: December 8, 2006

25 Jean Basle
Deputy County Government Counsel
385 North Arrowhead Avenue, 4th Floor
San Bernardino, CA 92414-0140

26 By: _____ /s/ Jean Basle
27 Attorney for Defendant San Bernardino SAFE

1 DATE: December 8, 2006
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4

Marc S. Ehrlich
Best Best & Krieger LLP
5 Park Plz, #1500
Irvine, CA 92614

5 By: _____ /s/ Marc Ehrlich
6 Attorney for Defendant Riverside
County Transportation Commission
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RULE 45 ATTESTATION

9 In accordance with General Order 45, concurrence in the filing of this document has been
10 obtained from each of the other signatories and I shall maintain records to support this
11 concurrence for subsequent production for the court if so ordered or for inspection upon request
12 by a party.

13 By: _____ /s/ Yoshiko Inoue
14 Attorneys for Plaintiffs
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